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NAS WHITING FIELD
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LETTER WITH FLORIDA DEPARTMENT OF NATURAL RESOURCES COMMENTS
REGARDING PHASE 1 REMEDIAL INVESTIGATION FEASIBILITY STUDY NAS WHITING
FIELD FL
7/22/1992
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION



FLORIDA DEPARTMENT OF NATURAL RESOUR

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July 22, 1992

Mr. James Holland
Environmental Engineer
Department of the Navy
Naval Air Station - Whiting Field
5090 Ser 18/0708
Milton, Florida 32570-5000

Re: Remedial Investigation and Feasibility Study, Phase I, Naval
Air Station, Whiting Field, Milton, Florida
Technical Memorandum No. 1 - No. 6, May, 1992

Dear Mr. Holland:

We have reviewed the above referenced documents and provide the following comments:

- 1) Whiting Field is adjacent to our trust resources which include Clear Creek to the south, Big Coldwater Creek to the east, and the Blackwater River State Forest to the east. Any contaminants which may migrate from the base via air, groundwater, or surface water could impact the biota and their habitats.
- 2) The documents were often confusing and inconsistent. For example, in Technical Memorandum No. 6 (TM6), surface water detection results are mentioned in the text as mg/L, while Table 5-1 uses $\mu\text{g/L}$. This difference would cause a big affect upon organisms within the water. If mg/L of a contaminant, especially an inorganic substance, was discovered, it would be of major concern to us. However, if it is $\mu\text{g/L}$, the concern would be lessened.

Also, some of the detection limits (Table 5-6 of TM6) for some inorganics (i.e., Beryllium, Cadmium, Copper, Mercury, Silver, Cyanide) were above the Florida Surface Water Quality Standards (FSWQS) (Chapter 17-302, Florida Administrative Code), and Federal Ambient Water Quality Standards (AWQS).

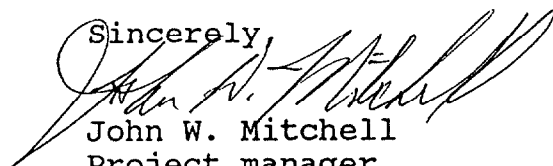
Page 2
NAS Whiting Field
July 22, 1992

- 3) On page 7-8 of TM6, reference is made to sampling procedures from the Quality Assurance Project Plan (QAPP) of the Jordan Workplan. We are unable to comment about sampling procedures without a copy of the QAPP. Please submit one to us.
- 4) In Figure 7-13 of TM6, the north arrow is pointing to the east.
- 5) In TM4, Table 3-3 denotes the Florida Surface Water Quality Standards for specific constituents. Some of the standards shown were incorrect for a few contaminants, and others which have standards, had no standards provided. Please refer to the most recent version of the rule Chapter 17-302, Florida Administrative Code dated 6-18-92.
- 6) Further surface water (SW) and sediment (SD) sampling is proposed in Clear Creek. We commend the Navy for looking past the air station for potential off-site migration of contaminants. However, due to some of the inconsistencies in the Technical Memorandums, we are unsure of the results of previous studies.

Also, besides looking in only the adjacent creeks, SW/SD sampling should be performed in the drainage ditches which flow from the base into these tributaries of the Blackwater River.

We regret being unable to attend the Technical Review Committee meeting on July 7, 1992. We had another pressing matter to attend which conflicted with the TRC meeting. Please keep us informed of remedial activities at Whiting Field. Should you have any questions, please contact me at (904)488-7454.

Sincerely,



John W. Mitchell
Project manager
Office of Policy and Planning

JWM

cc: Pam McVety, FDNR
Lynn Griffin, FDER
Waynon Johnson, NOAA
Jim Lee, DOI
Rob Pope, EPA